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One Atlantic Center
1201 West Peachtree Street
Atlanta, GA 30309-3424
404-881-7000 | Fax: 404-253-8476

Douglas S. Arnold

Direct Dial: 404-881-7637

Email: doug.arnold@alston.com

February 5, 2019

Mr. Greg Fuhrmann
Land Recycling Program Coordinator
Iowa Department of Natural Resources
502 E 9th Street
Des Moines, IA 50319

RCRA 2/5/2019

Re: Electrolux Home Products (Electrolux)
Former Manufacturing Facility – Jefferson, IA



Dear Mr. Fuhrmann:

I am writing on behalf of our client, Electrolux, regarding its former facility located at 601 East Central Street, Jefferson, Iowa. As you may recall, Electrolux previously submitted an application to enroll the property in Iowa's Land Recycling Program (LRP). In a letter dated June 6, 2017, IDNR denied the application, citing municipal well analytical results from the City of Jefferson (City) that detected the presence of cis-1, 2 - Dichloroethylene.

In response, the United States Environmental Protection Agency (EPA) conducted two groundwater investigations. The stated purpose of both EPA investigations was to determine if any environmental impacts present at the Electrolux property have migrated downgradient toward the City's municipal water supply wells. In brief, neither investigation found any evidence of off-site groundwater impacts associated with the Electrolux property. Copies of the reports are enclosed.

EPA's findings are consistent with the results of numerous on-site investigations conducted by Electrolux's consultant, Golder Associates (Golder). The data from the most recent groundwater sampling, which Golder collected in 2018, reconfirms that the identified impacts to groundwater from prior site operations are confined within the Electrolux property boundaries and are naturally attenuating. A copy of Golder's 2018 report is also enclosed.

Based on the results of these investigations, Electrolux respectfully asks that IDNR reconsider its prior position regarding enrollment of the property in the LRP. EPA Region 7 has confirmed that it has no objections to this request. Also, Golder has identified several similar sites in Iowa with

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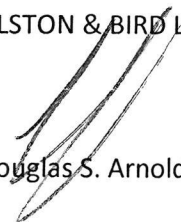
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chlorinated-impacts to groundwater (e.g., Aramark, CB&I Contractors, Henderson Manufacturing, Mayfair Cleaners, Victoria Cleaners, Marley Pump) that IDNR has accepted for LRP enrollment.

My client and I would greatly appreciate an opportunity to discuss this matter by telephone with you and your colleagues at your earliest convenience.

Regards,

ALSTON & BIRD LLP


Douglas S. Arnold

DSA:mfc

Enclosures: Toeroek Associates, *Groundwater Sampling Event Report of Findings, Rev. 01*, Former Electrolux, Inc. Facility, Jefferson, Iowa, Contract No. EP-W-13-002, Task Order 035 from U.S. EPA, Technical Directive No. 4, June 2, 2017

Toeroek Associates, *Monitoring Well Installation and Groundwater Sampling Event Final Report of Findings*, Former Electrolux, Inc. Facility, Jefferson, Iowa, Contract No. EP-W-13-002, Task Order 035 from U.S. EPA, Technical Directive No. 8, July 26, 2018

Golder Associates, *2018 Groundwater Monitoring Summary Report*, former Electrolux Home Products, Inc. Facility, January 2019, prepared by Golder Associates

cc: Andrew Stienecker, Esq., Electrolux Home Products
James Peace, Golder Associates
Doug Ucci, BSI Services and Solutions East Inc.
Don Lininger, EPA Region 7
Brian Mitchell, EPA Region 7